

Law Offices of
OLSON, CANNON, GORMLEY, ANGULO & STOBERSKI
A Professional Corporation
 9950 West Cheyenne Avenue
 Las Vegas, Nevada 89129
 (702) 384-4012 Telecopier (702) 383-0701

WALTER R. CANNON, ESQ.
 PETER M. ANGULO, ESQ.
 OLSON, CANNON, GORMLEY,
 ANGULO & STOBERSKI
 9950 W. Cheyenne Avenue
 Las Vegas, Nevada 89129
 (702) 384-4012 - telephone
 (702) 383-0701 - facsimile

Attorneys for Defendants

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

KISHA L. NORMAN,
 Plaintiffs,

vs.

COUNTY OF CLARK, a political
 subdivision, and municipality including
 its department of CLARK COUNTY
 DEPARTMENT OF JUVENILE JUSTICE
 SERVICES,
 Defendants.

CASE NO. 2:14-CV-1622-APG-GWF

STIPULATION AND ORDER TO EXTEND DISCOVERY AND OTHER DEADLINES
(Second Request)

Plaintiff by and through her counsel Terri Keyser-Cooper, Esq. and Defendant COUNTY OF CLARK, by and through its counsel Peter M. Angulo, Esq., and file their joint application to extend the discovery cut-off period and other deadlines in this case. The present discovery cut-off date is August 6, 2015, as set forth in the Order granting Stipulation for Extension of Time (First Request) entered by this Court on April 13, 2015 (#28).

DISCOVERY COMPLETED TO DATE:

The parties have undertaken the following discovery to date:

On December 1, 2014, Plaintiff propounded her 26(f) Production

On December 4, 2014, Defendants propounded their 26(f) Production

On February 19, 2015, Defendants propounded their 26(f) Production (First Supplement)

On February 19, 2015, Plaintiff submitted Request for Production of Documents (Set

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1 One) to Defendant County of Clark Juvenile Justice

2 On February 19, 2015, Plaintiff submitted Interrogatories to County of Clark Department
3 of Juvenile Justice Services (Set One)

4 On February 20, 2015, Plaintiff submitted Request for Production of Documents
5 (Amended) (Set One) to Defendant County of Clark Department of Juvenile Justice

6 On March 23, 2015, Defendant County of Clark Department of Juvenile Justice
7 propounded Responses to First Set of Request for Production of Documents (Amended First Set)

8 On March 23, 2015, Defendant County of Clark Department of Juvenile Justice
9 propounded Responses to Interrogatories

10 On March 30, 2015, Defendants propounded their 26(f) Production (Second Supplement)

11 On April 3, 2015, Plaintiff propounded Request for Production of Documents (Set Two)
12 to Defendant

13 On April 3, 2015, Plaintiff propounded Interrogatories to County of Clark Department of
14 Juvenile Justice Services (Set Two)

15 On April 6, 2015, Plaintiff submitted a second set of Interrogatories and Request to
16 Produce to County of Clark Department of Juvenile Justice Services

17 On April 16, 2015, Plaintiff propounded a Request to Permit Entry and Inspection

18 On April 25, 2015, Plaintiff propounded her Second Supplemental Disclosures

19 On May 15, 2015, Defendant propounded Request for Admissions to Plaintiff

20 On May 15, 2015, Defendant propounded Interrogatories to Plaintiff

21 On May 15, 2015, Defendant propounded Request for Production of Documents to
22 Plaintiff

23 On June 22, 2015, Plaintiff propounded her Third Supplemental Disclosures

24 On June 23, 2015, Plaintiff propounded her Responses to Defendant's Interrogatories

25 On June 23, 2015, Plaintiff propounded her Responses to Defendant's Demand for
26 Production of Documents

27 On June 23, 2015, Plaintiff propounded her Response to Defendant's Request for
28 Admissions

1 On July 1, 2015 the deposition of Plaintiff, Kisha Norman, was taken

2 On July 2, 2015, the deposition of Kelly Goetz was taken

3 On July 2, 2015, the deposition of Carolyn Banks was taken

4 On July 2, 2015, the deposition of Troy Brown was taken

5 On July 2, 2015, the deposition of Jacqueline Alvarado was taken

6 **DISCOVERY REMAINING:**

7 Attorneys for the parties anticipate that the following discovery will be required:

8 Counsel for Defendant will continue the deposition of Plaintiff once her discovery
9 responses have been supplemented by Plaintiff. Defendant further will set the depositions of
10 Jacqueline Gonzales, Jessica Delgado, Mark Marumato, and Don McCloud.

11 The parties anticipate noticing the depositions of all involved parties and witnesses
12 identified in the 26.1 productions.

13 The parties are in the process of retaining expert and rebuttal witnesses.

14 The parties anticipate taking the depositions of expert witnesses, rebuttal witnesses,
15 named witnesses and any other person connected to the subject incident

16 **REASONS WHY SUCH REMAINING DISCOVERY HAS NOT BEEN COMPLETED:**

17 The parties have a discovery dispute regarding Plaintiff's responses to Interrogatories.
18 Plaintiff contends the interrogatories as written are objectionable because they are overbroad,
19 burdensome and will take a tremendous amount of time to respond and necessarily involve
20 attorney work product. Defendant insists they are appropriate. The parties are working to
21 resolve this dispute with ongoing discussions.

22 Presently discovery is set to close on August 6, 2015. Unless discovery is extended, there
23 is no time for defendant to respond to vital necessary additional discovery. There is no possible
24 way to complete all the discovery necessary without extending the August 6, 2015 date.

25 Plaintiff's counsel will be out of the country from November 28, 2015 to December 23,
26 2015.

27 The parties have been diligent in propounding discovery and evaluating the case. This
28 request is made in good faith and not for the purpose of causing unnecessary delay. The parties

1 are working together amicably, in a professional manner, to move the case along. With this
 2 extension to time the parties will be able to effectively present the case, define the issues, and
 3 streamline the anticipated trial.

4 Based upon the foregoing, the parties have stipulated to the following proposed schedule
 5 for the remaining discovery:

6 1. That the current discovery cutoff date of August 6, 2015, may be extended for a
 7 period of ninety (90) days to and including ***Wednesday, December 2, 2015.***

8 3. Plaintiffs and Defendants shall disclose their experts to each other at least sixty
 9 (60) days before the discovery cut-off date, which is by ***Friday, October 2, 2015,*** and
 10 Plaintiffs and Defendants shall disclosure rebuttal experts at least thirty (30) days after the
 11 initial date for disclosure of experts, which is by ***Monday, November 2, 2015.***

12 4. All pretrial motions, including but not limited to, discovery motions, motions to
 13 dismiss and motions for summary judgment shall be filed and served no later than 30 days after
 14 the close of discovery, which is by ***Monday, January 4, 2016.***

15 5. The Joint Pretrial Order in the above-entitled action shall be filed with this Court
 16 no later than thirty (30) days after the date set for filing dispositive motions, which shall be by
 17 ***Wednesday, February 3, 2016,*** unless dispositive motions are filed, in which case the date for
 18 filing the Joint Pretrial Order shall be suspended until thirty (30) days after the decision of the
 19 dispositive motions or further order of this Court.

20 6. The parties have entered into this Stipulation in an effort to complete discovery
 21 and pretrial motions. The parties are not delaying the conclusion of this matter by way of trial or
 22 otherwise; rather, the parties are trying to garner all the necessary information, through formal
 23 discovery or interviews to evaluate this case for settlement purposes. No trial date has yet been

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ordered.

This Stipulation is entered into this 15th day of July, 2015.

LAW OFFICE OF TERRI
KEYSER-COOPER

OLSON, CANNON, GORMLEY,
ANGULO & STOBERSKI

By /s/ Terri Keyser-Cooper
TERRI KEYSER-COOPER, ESQ.
3590 Barrymore Drive
Reno, Nevada 89512
Attorneys for Plaintiff

By /s/ Peter M. Angulo
PETER M. ANGULO, ESQ.
9950 W. Cheyenne Avenue
Las Vegas, Nevada 89129
Attorneys for Defendants

ORDER

IT IS HEREBY ORDERED:

The discovery cut-off is extended from August 6, 2015, and discovery in this action shall be completed on or before ***Wednesday, December 2, 2015.***


IT IS FURTHER ORDERED:

Plaintiffs and Defendants shall disclose their experts to each other at least sixty (60) days before the discovery cut-off date which is by ***Friday, October 2, 2015,*** and Plaintiffs and Defendants shall disclosure rebuttal experts at least thirty (30) days after the initial date for disclosure of experts, which is by ***Monday, November 2, 2015.***

All pretrial motions, including but not limited to, discovery motions, motions to dismiss and motions for summary judgment shall be filed and served no later than 30 days after the close of discovery, which is by ***Monday, January 4, 2016.***

The Joint Pretrial Order in the above-entitled action shall be filed with this Court no later than thirty (30) days after the date set for filing dispositive motions, which shall be by ***Wednesday, February 3, 2016,*** unless dispositive motions are filed, in which case the date for filing the Joint Pretrial Order shall be suspended until thirty (30) days after the decision of the dispositive motions or further order of this Court.

DATED this 22 day of July, 2015.



GEORGE FOLEY, JR.
United States Magistrate Judge